

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
NML CAPITAL, LTD.,	:	
Plaintiff,	:	
v.	:	14 Civ. 8988 (TPG)
THE REPUBLIC OF ARGENTINA,	:	
Defendant.	:	
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**NOTICE OF MOTION BY NML CAPITAL, LTD.
FOR PARTIAL SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, and upon the accompanying Declaration of Robert A. Cohen, dated February 6, 2015, and all attached exhibits, the accompanying Declaration of Elliot Greenberg, dated February 6, 2015, the accompanying Statement of Material Facts, and the Memorandum of Law in Support of the Motion by NML Capital, Ltd. for Partial Summary Judgment filed on February 3, 2015 in *NML Capital, Ltd. v. Republic of Argentina*, 14 Civ. 8601 (TPG) (ECF No. 7) (the “Memorandum of Law”), attached hereto as Exhibit A (except for Section II of the Argument which is inapplicable to this action).¹ Plaintiff NML Capital, Ltd. (“NML”) will move before the

¹ Plaintiff joins in and incorporates by reference the Memorandum of Law with the following substitutions: 1) references to paragraphs 5, 6, and 7 of the Declaration of Elliot Greenberg shall refer instead to the paragraphs 4, 5, and 6, respectively, of the accompanying Declaration of Elliot Greenberg; and 2) references to the Declaration of

Honorable Thomas P. Griesa, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an Order granting partial summary judgment to NML as to the Republic of Argentina's ("Argentina") violation of the Section 1(c) of the 1994 Fiscal Agency Agreement, and for such other relief as the Court deems just and proper.

NOTICE IS FURTHER GIVEN that Argentina's response to this Motion, if any, shall be served within fourteen (14) days after service hereof, on counsel for NML: Robert A. Cohen, Dechert LLP, 1095 Avenue of the Americas, New York, NY 10036-6797.

New York, New York
February 6, 2015

DECHERT LLP

By: /s/ Robert A. Cohen
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Attorneys for Plaintiff NML Capital, Ltd.

Robert A. Cohen shall refer instead to the corresponding paragraphs of the accompanying Declaration of Robert A. Cohen.